

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MARYLAND**

GARY WASHINGTON,

Plaintiff

v.

BALTIMORE POLICE DEPARTMENT, *et al.*,

Defendants

Case No. 1:19-cv-02473-SAG

Judge Stephanie Gallagher

**JURY TRIAL DEMANDED**

**PLAINTIFF'S LOCAL RULE 104.7 CERTIFICATION**

Plaintiff, Gary Washington, by and through his counsel, certifies his compliance with Local Rule 104.7 in relation to his discovery dispute with the Officer Defendants. In support of this certification, Plaintiff states as follows:

1. On April 23, 2021, at 10:00am, counsel for the Officer Defendants, Shneur Nathan, counsel for the Baltimore Police Department, Natalie Amato, and Plaintiff's counsel, Renee Spence, attended a telephonic conference to confer about the issues described in Plaintiff's letter sent on April 9, 2021. Ex. A (Letter to Officer Defendants) <sup>1</sup>.
2. The Officer Defendants' counsel and Plaintiff's counsel continued to confer about the outstanding discovery issues through e-mail on April 26, 2021, April 30, 2021, May 3, 2021, and May 7, 2021. Ex. B (Emails between Officer Defendants' and Plaintiff's counsel).
3. Through this correspondence, the parties were able to narrow the issues and are still conferring about certain items.

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<sup>1</sup> Memoranda served in compliance with Local Rule 104.8(a).

4. Despite sincere attempts to resolve their differences, however, the parties were unable to reach a resolution as to the Officer Defendants' responses to Plaintiff's First Set of Interrogatories Nos. 5 and 11, and Plaintiff now seeks the Court's assistance. Ex. C (Plaintiff's Letter-Motion to Compel).

Respectfully submitted,

GARY WASHINGTON

By: /s/ Renee Spence

*One of Plaintiff's Attorneys*

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**CERTIFICATE OF SERVICE**

I, Renee Spence an attorney, hereby certify that I filed the foregoing document via the Court's CM/ECF system on May 13, 2021 and thereby served a copy on all counsel of record.

/s/ Renee Spence

*One of Plaintiffs' Attorneys*